

Danner, Ward

From: Dadap, Nathan C.
Sent: Thursday, October 24, 2013 10:09 AM
To: hhashemi@dtsc.ca.gov
Subject: FW: Clarification regarding disposal of PCB Waste

Tony:

My name is Nathan Dadap and I'm a project manager in the Waste Management Division at EPA Region 9. I was recently assigned the former Southwest Marine Site on Terminal Island, CA, which I understand has PCB contamination that is regulated under TSCA. I got your contact information from a Public Notice posted online for the cleanup of other contaminants at the site.

The Port of LA has recently been inquiring about where to send PCB waste and I responded with the email below to clarify where the waste should go based on PCB concentration levels. However, it seems they still have some questions about manifesting <50ppm PCB waste. Since PCBs at those concentrations are regulated by DTSC, I plan to refer them back to your agency for any manifest requirements.

If you'd like to discuss this matter or any other issues at the site, please feel free to call me at (415) 972-3654.

Thanks,
Nathan

Nathan Dadap
U.S. EPA Region 9
RCRA Facilities Management
75 Hawthorne Street
San Francisco, CA 94105

Phone: (415) 972-3654
Fax: (415) 972-3530

From: Brenner, Rita [mailto:RBrenner@portla.org]
Sent: Thursday, October 24, 2013 9:31 AM
To: Dadap, Nathan C.
Cc: Paul Parmentier; Ragland, Ken; Foley, Chris; 'Neil Irish'
Subject: RE: Clarification regarding disposal of PCB Waste

Thanks Nathan. Can you also clarify how the manifests for soils with PCB wastes <50 ppm are to be labeled for this project? In particular, would manifests for soils with less than 50 ppm PCB's still be required to be specifically identified and called out as a "TSCA waste"?

Rita

From: Dadap, Nathan C. [mailto:DADAP.NATHAN@EPA.GOV]
Sent: Wednesday, October 23, 2013 5:02 PM
To: Brenner, Rita

Cc: Paul Parmentier

Subject: Clarification regarding disposal of PCB Waste

Hi Rita,

Paul had mentioned to me today that the Port of LA wanted some clarification regarding the disposal of PCB waste based on the concentration. You can find the requirements listed in 40 C.F.R. § 761.61(a)(5), but in summary:

1. Soils (which constitute "Bulk PCB remediation wastes") with concentrations below 50 ppm DO NOT need to be disposed of in a hazardous waste landfill.

761.61(a)(5)(i)(B)(2)(ii) – Bulk PCB remediation wastes with a PCB concentration of <50 ppm shall be disposed of in accordance with paragraph (a)(5)(v)(A) of this section.

Those facilities include:

- (1) A facility permitted, licensed, or registered by a State to manage municipal solid waste subject to part 258 of this chapter.
- (2) A facility permitted, licensed, or registered by a State to manage non-municipal non-hazardous waste subject to §§ 257.5 through 257.30 of this chapter, as applicable.
- (3) A hazardous waste landfill permitted by EPA under section 3004 of RCRA, or by a State authorized under section 3006 of RCRA.
- (4) A PCB disposal facility approved under this part.

2. Soils with concentrations 50 ppm or above DO need to be disposed of in a TSCA-approved landfill.

761.61(a)(5)(i)(B)(2)(iii) – Bulk PCB remediation wastes with a PCB concentration ≥50 ppm shall be disposed of in a hazardous waste landfill permitted by EPA under section 3004 of RCRA, or by a State authorized under section 3006 of RCRA, or a PCB disposal facility approved under this part.

Hope that provides some clarification. Please let me know if you have any other questions.

Thanks,
Nathan

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